


Message

From: Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]
Sent: 5/4/2022 4:02:30 PM
To: Scianni, Melissa [Scianni.Melissa@epa.gov]; Gymer, Lisa@Wildlife [Lisa.Gymer@wildlife.ca.gov]; Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]; Steinert, Tiffany@Waterboards [Tiffany.Steinert@waterboards.ca.gov]
CC: Tracey Brownfield [tracey@landveritas.com]; Nate Bello [bello@wra-ca.com]; Stephanie Gad [gad@wra-ca.com]; Julie Garren [julie.garren@wra-ca.com]
Subject: Re: FW: RIBITS Notification  - Daily Activity

Hi all,

I believe we have identified what's going on with the negative balances on RIBITS following reporting of the Williams Homes sale. Please note that in our ledger we did not have any overdraft - all our balances are positive or 0. The main issue has to do with rounding and the level of precision that is tracked in RIBITS versus our ledger. I've detailed the specific explanations per credit type in the sections below, take a look and let me know if you have any further questions or if you'd like to hop on a Zoom so we can screen share and I can walk you through it more dynamically.

I recommend the release amounts input into RIBITS be adjusted to the 0.01-acre increment to resolve this issue, but please advise on next steps.

Thanks,
Marlene

Ephemeral Stream Preservation:

- We entered debits at the 0.01-increment but Release 3 was input at the 0.001-increment into RIBITS, changing the Total Released amount to show at the 0.001-increment
- Since we round up when reporting to RIBITS, it looks like we went over, but if Release 3 was input at the 0.01-increment we would not have gone over
- Release 3 was input as 0.048. Rounded up that would be 0.05, which is equal to our total debits
- The difference between 0.048 and 0.05 is 0.002, which is equal to the negative balance shown on RIBITS

A	B	C	D	E	F	G	H	I	J	K	L	M	
Type	Transac	Jurisdic	Transaction Date	Project	Permitt	Permit	Credit Classification	N Credits	Acres	Linear f	Impact	Impact	Comment
Init	76641	Federal	5/11/2016				Ephemeral Stream Preservation	0.32	0.32				Waters of the U.S. Preservation-Only Credit
Rel	76661	Federal	6/2/2016				Ephemeral Stream Preservation	0.05	0.05				Phase 1, Areas A & E
Wdr	81092	Federal	3/13/2017			Pierce Har 1600-2006	Ephemeral Stream Preservation	0.05	0.05				84 Lumber Lancaster Stone
Rel	91061	Federal	7/30/2018				Ephemeral Stream Preservation	0.08	0.08				Second Credit Release; Phase 1, Areas A & E
Wdr	92506	Federal	2/5/2019			City of San 1600-2018	Ephemeral Stream Preservation	0.08	0.08				Canyon Country Community Center and Drainage
Rel	110341	Federal	6/16/2021				Ephemeral Stream Preservation	0.048	0.05				Third (Partial) Credits Release; Phase 1, Area A
Wdr	113509	Federal	4/7/2022			Williams H 1600-2007	Ephemeral Stream Preservation	0.05	0.05				Park Place Project - Initial Credits

Seasonal Wetland Preservation:

- We entered debits at the 0.01-increment but Release 2 and Release 3 were input at the 0.001-increment into RIBITS, changing the Total Released amount to show at the 0.001-increment.
- Since we round up when reporting to RIBITS, it looks like we went over, but if these two releases were input at the 0.01-increment we would not have gone over
- Release 1 was input as 0.19 but Release 2 was input as 0.323 and Release 3 as 0.194, making the total released 0.707. Rounded up that would be 0.71, which is equal to our total debits

- The difference between 0.707 and 0.71 is 0.003, which is equal to the negative balance shown on RIBITS

Type	Trans	Jurisd	Transaction Date	Project	Permit	Permit	Credit Classification	Credit	Acres	Linear	Impact	Impact	Comment
Init	76648	Federal	5/11/2016				Seasonal Wetland Preservation	1.29	1.29				Waters of the U.S. Preservation-Only Credit
Rel	76668	Federal	6/2/2016				Seasonal Wetland Preservation	0.19	0.19				Phase 1, Areas A & E
Rel	91068	Federal	7/30/2018				Seasonal Wetland Preservation	0.308	0.31				Second Credit Release; Phase 1, Areas A & E
Rel	110347	Federal	6/16/2021				Seasonal Wetland Preservation	0.194	0.19				Third (Partial) Credits Release; Phase 1, Areas A
Wdr	112278	Federal	2/1/2022				North Sky 1600-201 Seasonal Wetland Preservation	0.08	0.08				North Sky River Energy LLC
Wdr	113513	Federal	4/7/2022				Williams 1600-201 Seasonal Wetland Preservation	0.65	0.65				Park Place Project - Initial Credits
Total Released								0.707	<-- rounded would be 0.71				
Total Debited								0.71					

Open Water Preservation:

- Issue 1: Release 3 was never input into RIBITS, so a tiny fraction of 404 credit (0.001476 acres) is missing from the RIBITS ledger that we have recorded in ours - total discrepancy is 0.002.
- Issue 2: Release 1 was input as 0.18 into RIBITS, but in our ledger it is actually 0.185, which we round up to 0.19 acres - total discrepancy is 0.01.
- Result: The total of these two discrepancies is 0.012, which is how much it shows we are over debited on the RIBITS ledger.

WRA Ledger		
Transaction_Type	Release	Y
Transaction_No	Y	404_Credit_Type
Y	Sum of Transfer_Acres	
Release A1	Open Water Preserved	0.001476
Release A2	Open Water Preserved	0.002459
Release A3	Open Water Preserved	0.001476
Release E1	Open Water Preserved	0.1839930
Release E2	Open Water Preserved	0.3066550
Release E3	Open Water Preserved	0.0000000
Grand Total		0.49606
Combined Releases		
Release 1 (A+E)		0.1854687
Release 2 (A+E)		0.3091145
Release 3 (A+E)		0.0014757
Total		0.4960589

Type	Trans	Jurisd	Transaction Date	Project	Permit	Permit	Credit Classification	Credit	Acres	Linear	Impact	Impact	Comment
Init	76645	Federal	5/11/2016				Open Water Preservation	1.23	1.23				Waters of the U.S. Preservation-Only Credit
Rel	76665	Federal	6/2/2016				Open Water Preservation	0.18	0.18				Phase 1, Areas A & E
Rel	91065	Federal	7/30/2018				Open Water Preservation	0.308	0.31				Second Credit Release; Phase 1, Areas A & E
Wdr	113511	Federal	4/7/2022				Williams H 1600-2007 Open Water Preservation	0.5	0.5				Park Place Project - Initial Credits

On Tue, May 3, 2022 at 4:57 PM Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com> wrote:

Hi all, just wanted to give an update that we are still looking into this but making progress and we will get back to you tomorrow with a resolution.

On Tue, May 3, 2022 at 12:43 PM Nate Bello <bello@wra-ca.com> wrote:

Hi all,

We will look into this further and get back to all of you. However, at first glance I notice the negative balances are in the thousandths of an acre, but per the BEI we only report debits to the hundredths of an acre. It appears the last release was entered to the thousandths, that could create the issue. I will look deeper.

Regards,

Nate

On Tue, May 3, 2022, 12:31 PM Tracey Brownfield <tracey@landveritas.com> wrote:

Hi Melissa,

WRA manages the ledger for the bank, and I asked them to look into this ASAP. We will keep you posted, Tracey

On Tue, May 3, 2022 at 11:09 AM Scianni, Melissa <Scianni.Melissa@epa.gov> wrote:

Hi Tracey,

RIBITS sent out notification today that the Petersen Ranch ledger has several negative balances. Can you please provide an explanation for the apparent negative balances noted below?

Thank you,
Melissa

Melissa Scianni
Wetlands Office
US EPA, Region IX, Southern CA Field Office
600 Wilshire Blvd, Suite 940
Los Angeles, CA 90017
(213) 244-1817
scianni.melissa@epa.gov


-----Original Message-----

From: ribits_helpdesk@araseas.com <ribits_helpdesk@araseas.com>

Sent: Tuesday, May 3, 2022 12:25 AM

To: Scianni, Melissa <Scianni.Melissa@epa.gov>

Cc: ribits_emailsent@araseas.com

Subject: RIBITS Notification  - Daily Activity

Dear MSCIANNI,

You are receiving this notification due to your affiliation with RIBITS banks, sites, ILF programs, umbrellas, NRDA programs/projects, or WQT programs/projects that have had recent activity.

For more detailed information, contact the appropriate manager or go to

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fribits.ops.usace.army.mil%2F&>

;data=05%7C01%7CScianni.Melissa%40epa.gov%7C10b295d3624a42acc7a208da2cd61229%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637871595182029119%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=MKDqpKde4AuJloimysQqoExIDNuuUuyujwTl7bZrCyg%3D&reserved=0.

****Withdrawal causing negative Stream Ephemeral Stream Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)

Transaction Id: 113509

Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Stream

Credit Classification: Ephemeral Stream Preservation

Permittee: Williams Homes

Permits: 1600-2007-0121-R5

Credits: .05

Resulting balance of available Stream Ephemeral Stream Preservation credits: -.002.

****Withdrawal causing negative Stream Open Water Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)

Transaction Id: 113511

Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Stream

Credit Classification: Open Water Preservation

Permittee: Williams Homes

Permits: 1600-2007-0121-R5

Credits: .5

Resulting balance of available Stream Open Water Preservation credits: -.012.

****Withdrawal causing negative Wetland Seasonal Wetland Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)

Transaction Id: 113513

Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Wetland

Credit Classification: Seasonal Wetland Preservation

Permittee: Williams Homes

Permits: 1600-2007-0121-R5

Credits: .63

Resulting balance of available Wetland Seasonal Wetland Preservation credits: -.003.

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Tracey Brownfield
Land Veritas
1001 Bridgeway #246
Sausalito, CA 94965

(415)729-3734
(415)519-6530 cell
(415)534-0950 fax
tracey@landveritas.com
www.landveritas.com

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MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: [858.682.2699](tel:858.682.2699) | o: [858.842.1800](tel:858.842.1800) x 2210 |
c: [248.499.0805](tel:248.499.0805) | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg |
Denver

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MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: [858.682.2699](tel:858.682.2699) | o: [858.842.1800](tel:858.842.1800) x 2210 |
c: [248.499.0805](tel:248.499.0805) | tyner-valencourt@wra-ca.com

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